

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

v.

MERCEDES HARRIS-KARTO

Defendant(s)

Case No.

2:21-MJ-162

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

OCT 19 2021

CLERK, U.S. DISTRICT COURT

By Deputy

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 18, 2021 in the county of Carson in the
Northern District of Texas, the defendant(s) violated:*Code Section*Title 21, United States Code,
Sections 841(a)(1), 841(b)(1)(C)*Offense Description*

Distribution and Possession with Intent to Distribute Methamphetamine

This criminal complaint is based on these facts:

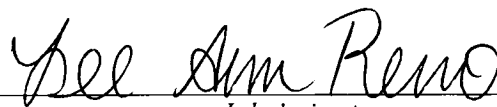
see attached affidavit in support of complaint.

☒ Continued on the attached sheet.*Complainant's signature*

Malcolm White, DEA TFO

Printed name and title

Attested to in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone:

Date: 10/19/2021*Judge's signature*City and state: Amarillo, TX

Lee Ann Reno, U.S. Magistrate Judge

Printed name and title

No. 2:21-MJ-162

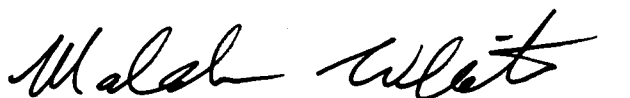
AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Malcolm White, being sworn, depose and state as follows:

- 1) I am a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA).
- 2) I am assigned to the DEA's Amarillo Resident Office (ARO). I was selected and assigned as a TFO with DEA in October of 2019. In connection with my duties and responsibilities as a Special Agent with the Texas Department of Public Safety (DPS) and a TFO with DEA, I have received extensive training in the field of narcotics trafficking investigations, including but not limited to, conducting surveillance, smuggling, undercover operations, methods of packaging, utilizing confidential sources, as well as executing arrest and search warrants. In May of 2019 I was promoted from a patrol position to the rank of Special Agent within Texas DPS and assigned to the Amarillo District Office. Prior to my assignment in the Criminal Investigations Division of DPS, I was a Trooper assigned to the Highway Patrol Division for approximately 5 years. During that time, I made narcotic arrests and assisted in narcotics investigations.
- 3) This affidavit is made in support of a complaint and arrest warrant for Mercedes HARRIS-KARTO. I am familiar with the information contained in this affidavit based upon my own personal investigation, as well as conversations with other law enforcement officers involved in this investigation.
- 4) On October 18, 2021, Texas DPS Trooper Austin Albright was on routine patrol on Interstate 40 (IH-40) in Carson County, TX. At approximately 7:13 PM, Trooper Albright observed a gray Nissan passenger vehicle bearing California registration: 8JOE006 traveling east on IH-40. Trooper Albright observed this vehicle traveling over the posted speed limit of 75 miles per hour, which is a violation of the Texas Transportation Code. Trooper Albright initiated a traffic stop on the vehicle for the traffic violation inside Carson County on IH-40. Trooper Albright contacted the driver who identified herself as Mercedes HARRIS-KARTO with a New Jersey driver license. During the roadside contact, Trooper Albright observed several indicators of criminal activity leading him to believe illegal activity was occurring outside the scope of the traffic violation.

5) Trooper Albright asked for consent to search the vehicle from HARRIS-KARTO. HARRIS-KARTO refused consent to search at which time Trooper Albright contacted a K-9 officer to respond to the scene and have the K-9 perform a free air sniff of the vehicle. While waiting for the K-9 to arrive, HARRIS-KARTO re-initiated contact with Trooper Albright. HARRIS-KARTO then informed Trooper Albright that the K-9 would alert to the vehicle due to marijuana being inside the car. A probable cause search was then performed by Trooper Albright. During the search, Trooper Albright located three (3) packages of a crystalline substance which had the appearance and consistency of crystal Methamphetamine. The total weight of these packages was later determined to be approximately 1.35 kilograms. All Methamphetamine was found packaged in Ziploc or vacuum-sealed bags and concealed near the spare tire underneath the trunk floor. Additionally, an unknown substance was found inside of an apple juice container and marijuana products were located inside of the passenger compartment.

6) DEA Task Force Officers Malcolm White, Vern Wilson, DPS Special Agent Brent Williams, as well as DEA Special Agent John Carson and DEA Resident Agent in Charge John Brendon responded to the scene to assist in the investigation. TFO's Malcolm White and DPS SA Brent Williams read HARRIS-KARTO Miranda warnings prior to conducting an audio recorded interview. After being read Miranda Warnings and agreeing to speak with agents, HARRIS-KARTO advised that she had traveled from New Jersey to California to deliver a single document to a relative regarding a family member's will. Shortly into the interview, HARRIS-KARTO invoked right to counsel and the interview was terminated. HARRIS-KARTO denied any knowledge of the found drugs to Trooper Albright and later to agents. HARRIS-KARTO further refused officers access to her phone and would not allow a search of the device. After the recorder was turned off and TFO White had stepped out to make a phone call, DPS SA Williams and HARRIS-KARTO were conversating about various innocuous topics. During this conversation, HARRIS-KARTO stated to SA Williams that she was not a bad person, that this trip was her first and that she was doing it for the betterment of her family. These statements were made without questioning or provocation by agents. HARRIS-KARTO was then transported to the Randall County Jail in Amarillo, Texas where she was booked in on a federal hold.



Malcolm White
DEA Task Force Officer

Attested to by telephone in accordance with the requirements of Fed. R. Crim. P. 4.1:

October 19, 2021 at Amarillo, TX
Date City and State

Lee Ann Reno U.S. Magistrate Judge
Name and Title of Judicial Officer

Lee Ann Reno
Signature of Judicial Officer

Meredith Pinkham
Meredith Pinkham
Assistant U.S. Attorney